GAMA-*An Association of Appliance & Equipment Manufacturers*
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December 28, 2004

Dorothy Shimer
Research Division, 5th floor
Air Resources Board
P.O. Box 2815
Sacramento, California 95812

RE: Comments on Revised Draft Indoor Air Quality Report, AB 1173 (Keeley)

The Gas Appliance Manufacturers Association (GAMA) is a 69-year old national trade association of manufacturers of gas, oil and electric products used for space heating and water heating and related components and accessories. GAMA's membership includes nearly all U.S. manufacturers of residential and commercial furnaces, boilers and water heaters, as well as manufacturers of vented and unvented gas space heaters. The health and safety of users of gas appliances is of paramount importance to GAMA, and the gas products manufactured by GAMA member companies have all been certified by recognized third party testing agencies as being in compliance with applicable national safety standards.

The revised draft report clarifies the wording for unvented appliances, in some cases. This clarification was not provided for but is relevant to the discussion of combustion appliances as a "High Ranked Source" in the "Prioritization of Sources and Pollutants Based on Exposure and Adverse Impacts." The concern is that vented and unvented combustion appliances are combined into one category without distinction (pg. 150) in a critical area of the report. Vented products meet national performance standards that do not allow combustion products to be emitted into the living environment, and readers ought to have this information when reviewing staff's recommendations for mitigation.

Also, page 122 of the revised report reads, "…the SCAQMD emission limits for gas water heaters in homes will be lowered in 2005 to 10 ng/j of NOx." A technical change is needed to reflect a delay recently adopted by SCAQMD that postpones the 10 ng/j requirement until 2006.

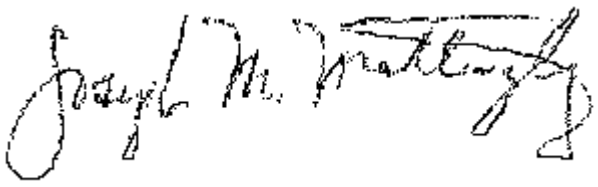
Lastly, CARB acknowledges in its response to comments that "specific applications [for cost] are beyond the scope of the report." Despite this acknowledgement, page 15 of the revised report continues to assert: "Low emission product designs or reformulations can usually be accomplished by the manufacturer, with minimal impact to the consumer,

often with only minor increased costs." Staff cited information on porous insert technology to justify the language. This example does not include costs to incorporate a new component technology into a complete gas appliance system.

Gas appliances are complex systems that are affected by the slightest change in the characteristics of combustion. Any alteration to these characteristics would entail significant research and development costs to ensure the continued safety and reliability of the entire system. An illustration is industry's expenditures to develop water heater systems that meet new 10 ng/j limits for NOx which to date total many millions of dollars. It is important to note that these costs will ultimately be borne by the consumer.

Thank you for the opportunity to share GAMA's concerns with the revised report. I can be reached at (703) 525-7060, ext. 230 or jmattingly@gamanet.org if staff has questions regarding our comments.

Sincerely,



Joseph M. Mattingly
Vice President and General Counsel
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